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Deluxe Corporation, RocketReach LLC,  
and PropertyRadar Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

WE INFORM, LLC., et al.,

Defendants.

Civil Action No. 1:24-cv-4037

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

INFOMATICS, LLC, et al.,

Defendants.

Civil Action No. 1:24-cv-4041

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

THE PEOPLE SEARCHERS, LLC, et al.,

Defendants.

Civil Action No. 1:24-cv-4045

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

DM GROUP, INC., et al.,

Defendants.

Civil Action No. 1:24-cv-04075

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

DELUXE CORPORATION, et al.,

Defendants.

Civil Action No. 1:24-cv-4080

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

QUANTARIUM ALLIANCE, LLC, et al.,

Defendants.

Civil Action No. 1:24-cv-4080

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

YARDI SYSTEMS, INC., et al.,

Defendants.

Civil Action No. 1:24-cv-4103

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

DIGITAL SAFETY PRODUCTS, LLC, et al.,

Defendants.

Civil Action No. 1:24-cv-4141

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

CIVIL DATA RESEARCH

Defendants.

Civil Action No. 1:24-cv-04143

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

SCALABLE COMMERCE, LLC, et al.,

Defendants.

Civil Action No. 1:24-cv-04160

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

LABELS & LISTS, INC.

Defendants.

Civil Action No. 1:24-cv-4174

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

INNOVIS DATA SOLUTIONS INC., et al.,

Defendants.

Civil Action No. 1:24-cv-4176

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

ACCURATE APPEND, INC., et al.

Defendants.

Civil Action No. 1:24-cv-4178

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

ZILLOW, INC., et al.,

Defendants.

Civil Action No. 1:24-cv-04256

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

EQUIMINE, INC., et al.,

Defendants.

Civil Action No. 1:24-cv-04256

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

MELISSA DATA CORP., et al.,

Defendants.

Civil Action No. 1:24-cv-4292

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

RESTORATION OF AMERICA, et al.,

Defendants.

Civil Action No. 1:24-cv-4324

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

i360, LLC, et al.,

Defendants.

Civil Action No. 1:24-cv-4345

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

GOHUNT, LLC, et al.,

Defendants.

Civil Action No. 1:24-cv-04380

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

ACCUZIP, INC., et al.,

Defendants.

Civil Action No. 1:24-cv-4383

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

SYNAPTIX TECHNOLOGY, LLC, et al.,

Defendants.

Civil Action No. 1:24-cv-4385

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

JOY ROCKWELL ENTERPRISES, INC., et  
al.,

Defendants.

Civil Action No. 1:24-cv-4389

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

E-MERGES.COM, INC.

Defendants.

Civil Action No. 1:24-cv-4434

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

NUWBER, INC., et al.,

Defendants.

Civil Action No. 1:24-cv-04609

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

ROCKETREACH LLC, et al.,

Defendants.

Civil Action No. 1:24-cv-4664

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

BELLES CAMP COMMUNICATIONS,  
INC., et al.,

Defendants.

Civil Action No. 1:24-cv-04949

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

PROPERTYRADAR, INC., et al.,

Defendants.

Civil Action No. 1:24-cv-5600

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

THE ALESCO GROUP, L.L.C.

Defendants.

Civil Action No. 1:24-cv-5656

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

SEARCHBUG, INC.

Defendants.

Civil Action No. 1:24-cv-05658

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

AMERILIST, INC., et al.,

Defendants.

Civil Action No. 1:24-cv-05775



ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

US DATA CORPORATION, et al.,

Defendants.

Civil Action No. 1:24-cv-7324

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

SMARTY, LLC, et al.,

Defendants.

Civil Action No. 1:24-cv-8075

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

COMPACT INFORMATION SYSTEMS,  
LLC, et al.,

Defendants.

Civil Action No. 1:24-cv-8451

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

DARKOWL, LLC, et al.,

Defendants.

Civil Action No. 1:24-cv-10600

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ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

THOMSON REUTERS CORPORATION, et  
al.,

Defendants.

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Civil Action No. 1:24-cv-04269

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ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

DELVEPOINT LLC, et al.

Defendants.

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Civil Action No. 1:24-cv-04096

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ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

SPY DIALER, INC., et al.,

Defendants.

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Civil Action No. 1:24-cv-11023

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

PEOPLEWHIZ, INC., et al.,

Defendants.

Civil Action No. 1:25-cv-00237

ATLAS DATA PRIVACY CORPORATION,  
et al.,

Plaintiffs,

v.

LIGHTHOUSE LIST COMPANY, LLC., et  
al.,

Defendants.

Civil Action No. 1:24-cv-11443

**DEFENDANTS' CONSOLIDATED MOTION TO DISMISS  
PURSUANT TO RULE 12(b)(6)**

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**PLEASE TAKE NOTICE** that the undersigned counsel for the defendants in the above-captioned matters (collectively, “Defendants”) hereby move for an order dismissing the Complaints filed in the above-captioned matters with prejudice pursuant to Federal Rule of Civil Procedure 12(b)(6) for failure to state a plausible claim upon which relief could be granted.

**PLEASE TAKE FURTHER NOTICE** that in support of the motion, Defendants shall rely on the enclosed Memorandum of Law and the Declaration of Angelo A. Stio, III and the exhibits attached thereto. A proposed form of Order also is submitted for the Court’s convenience.

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested.

Dated: March 18, 2025

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